COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

Investigation by the Department on its own motion,
pursuant to G.L. c.159 § § 12 and 16, into the
collocation security policies of Verizon New
England Inc. d/b/a Verizon Massachusetts

D.T.E. 02-8

VERIZON MASSACHUSETTS' MOTION FOR LEAVE TO SUBMIT AFFIDAVIT

Verizon Massachusetts (Verizon MA) moves for leave to submit the accompanying affidavit of Lynelle Reney. Ms. Reney's affidavit responds to erroneous information provided by AT&T in its response to record request RR-VZ-2, filed on or about July 26, 2002, after the close of hearings in this case. Specifically, Ms. Reney's affidavit corrects AT&T's misstatement that AT&T established a virtual collocation arrangement outside of Massachusetts "because no physical [collocation] was available at the time it was ordered." To the contrary, AT&T voluntarily entered and maintains that virtual collocation arrangement even though physical collocation was and is available at the central office in question.

Ms Reney's affidavit is relevant to the issues regarding virtual collocation and Verizon MA's proposals involving virtual collocation. It also impeaches the credibility of AT&T's witnesses and their criticisms of virtual collocation. AT&T's erroneous statements were made in responses to record requests filed after the close of the hearings. Accordingly, Verizon MA has no other opportunity to correct AT&T's erroneous statements on the record.

For the foregoing reasons, the Hearing Officer should accept Ms. Reney's affidavit and make it part of the record in this case.

By its attorneys,

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